

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**JOHN W. GOFF,**

**Plaintiff,**

**VS.**

**PHOENIX-DURANGO, LLC;  
JEREMIAH A. HENDERSON, II; and  
JEREMIAH A. HENDERSON, III**

**Defendants.**

**CIVIL ACTION NO.: 2:06cv389-SRW**

**REQUEST FOR PRODUCTION OF JURISDICTIONAL RELATED  
DISCOVERY TO DEFENDANTS JEREMIAH A. HENDERSON, II &  
JEREMIAH A. HENDERSON, III**

COMES NOW the Plaintiff John W. Goff and, by and through his attorney, respectfully requests the following jurisdictional related discovery be produced by the Defendants Jeremiah A. Henderson, II and Jeremiah A. Henderson, III. By requesting said discovery, the Plaintiff merely seeks to provide this Honorable Court with the proper factual record on which to make a ruling regarding Plaintiff's Motion to Remand, and in no way is submitting this controversy to the jurisdiction of the federal court system. The Plaintiff respectfully requests the Defendants produce documents responsive to the following requests:

1. Please produce a copy of the address of the house in which you presently reside.
2. Please produce a copy of the addresses of the houses in which you have resided in for the last ten (10) years.
3. Please produce a copy of the home and business addresses of any and all

family members and dependants, especially, but not limited to, those who presently reside in the states of Alabama or Texas.

4. Please produce documentation relating to voter registration and voting practices for the last ten (10) years.

5. Please produce any and all documents relating to any and all real property holdings in the states of Alabama and Texas, including, but not limited to, titles and mortgages on said properties.

6. Please produce any and all documents relating to any memberships of churches, clubs, civic organizations, or business organizations within the last ten (10) years. Said production should include, but not be limited to, documentation related to charges incurred, dues paid, and donations made to said organizations; as well as the permanent addresses of said organizations.

7. Please produce any and all documents relating to any bank or brokerage accounts held in the states of Alabama and Texas for the last ten (10) years.

8. Please produce any and all federal tax returns from the last ten (10) years.

9. Please produce any and all documents relating to any and all income, business, or property taxes paid to the states of Alabama and Texas from the last ten (10) years.

10. Please produce a copy of a current and valid driver's license.

11. Please produce a copy of any and all documentation related to vehicle purchase, registration, and sale for any and all vehicles purchased, registered, and sold within the last ten (10) years.

Respectfully submitted,

\s\ Jamie A. Johnston

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Thomas T. Gallion, III (GAL010)  
Jamie A. Johnston (JOH164)

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of May 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system that will send notification of such filing to the following parties or counsel:

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\s\ Jamie A. Johnston

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OF COUNSEL

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